

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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DR. BRIMA SYLLA, et al,

Civil Case No. 23-5261

Plaintiffs,

-against-

AMAZON LABOR UNION, and CHRIS SMALLS,  
as President of the Amazon Labor Union,

**DECLARATION OF  
ARTHUR SCHWARTZ**

Defendants.

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ARTHUR SCHWARTZ declares as follows under the penalties of perjury.

1. I have been the attorney for the Plaintiffs in this matter, and was the signatory for them on the Consent Order which was So Ordered by the Court on January 4, 2024.

2. The process led to an election which was conducted by mail ballot. The election was administered by the Honest Ballot Association. A Notice of Election was mailed out to the employees on the list supplied to the Neutral Monitor by Amazon, as per the Court's order of May 9, 2024, plus a list of terminated employees agreed on by the parties to this lawsuit. Ballots were mailed out on July 8, 2024. The deadline for receipt of ballots was July 29, 2024. The ballots were counted, with observers present, on July 30, 2024.

3. Annexed as Exhibit A is the Certification of the Election Results issued by the Honest Ballot Association. As the Court can see, the new officers, in the positions of President, Vice President, Secretary Treasurer and Recording Secretary, were all plaintiffs in this lawsuit, and not part of the incumbent group. Connor Spence received the most votes for President, Brima Sylla received the most votes for Vice President, Kathleen Cole received the most votes for Secretary Treasurer, and Sultana Hossain received the most votes for Recording Secretary. The Certification also shows 11 members elected to the union's Constitution/Bylaws Revision Committee.

4. In Rules issued by the Neutral Monitor, prior to the election count, after considering different proposals from counsel for the parties herein, directed that those who were the winners of the ballot count were to take office on July 31, 2024, even though election appeals could be filed for several days after that.

5. Given these facts, I request that this Court

a) Declare that Connor Spence has been elected President of ALU-IBT-Local 1; Brima Sylla has been elected Vice President of ALU-IBT-Local 1, Kathleen Cole has been elected Secretary Treasurer of ALU-IBT-Local 1; that Sultana Hossain has been elected Recording Secretary of ALU-IBT-Local 1 and that the following members of Amazon Labor Union have been elected to the Constitution/Bylaws Revision Committee:

Freddy Marana

Andres Albert

Devora Gonzalez

Tristian Martinez

Novelette Russell

Ebrima Baldeh

Pasquale Cioffi

Justine Medina

David Desyree Sherwood

Ruel Mohan

Yesim Kayacan

6. Such an Order is needed in order assist the new officers to establish control over bank accounts, web sites, litigation, etc.

7. Once the Court enters that Order, the case can be declared resolved/dismissed, save for an Attorneys Fee application pursuant to *Hall v Cole*, 412 US 1 (1973)

Dated: New York, New York  
August 11, 2024

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*/s/ Arthur Schwartz*  
Arthur Schwartz